

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Shannon M. Poulton and Terence M.  
Poulton  
Debtors,

Specialized Loan Servicing, LLC  
Movant.

v.

Shannon M. Poulton and Terence M. Poulton  
Debtors/Respondents,

William C. Miller, Trustee  
Additional Respondent.

BANKRUPTCY CASE NUMBER  
20-12607-mdc

CHAPTER 13

11 U.S.C. § 362

**STIPULATION AND ORDER**

AND NOW, in consideration of the mutual promises and agreements set forth below, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, it is hereby stipulated and agreed to by and between the undersigned as follows:

1. This Stipulation shall govern all post-petition payments due and owing to Movant, including those that fall due after the arrears, as set forth below, are cured.
2. As of September 27, 2021, the post-petition arrearages on the mortgage held by Movant on Debtors' property at 860 Weber Drive, Yardley, PA 19067 (the "Property"), are \$0.32. The breakdown of the arrears is as follows:

1 payment @ \$2211.75 – September 1, 2021  
Minus suspense \$2,211.43

TOTAL ARREARS = \$0.32

3. If Debtors provide proof of negotiated payments not already credited, they will receive credit for those payments.

4. Debtors shall resume making the regular monthly mortgage payments on October 1, 2021. If funds are not received prior to the 15<sup>th</sup> of the month, then the payment shall include all applicable late charges;

5. Should Debtors' regular monthly payment amount change, Debtors shall be notified of such change, and the monthly payment amount due under the terms of the Stipulation shall change accordingly;

6. All payments to Movant shall include the Loan No. written on the face thereof, and shall be made directly to Specialized Loan servicing LLC, Attention: Cash Department, 6200 S. Quebec St., Greenwood Village, CO 80111.

7. All payments made pursuant to this Stipulation and Order shall be applied first to reimburse Movant for its attorneys' fees and costs (as provided for above) in connection with this motion. All further payments will be applied to the arrears and/or monthly payments in the manner prescribed by the Mortgage and Note.

8. In the event that Debtors fail to make any of the payments set forth above, Movant shall notify Debtors and Debtors' attorney of the default in writing and Debtors may cure the default within 15 days of the notice. If the default continues to the following month, the Debtors shall include funds to cure that month's default as well. If Debtors should fail to cure the default within 15 days, Movant may file a Certification of Default with the Court, and upon the filing of the Certification, the Court shall enter an Order granting Movant relief from the automatic stay as to the Property.

9. In the event the instant bankruptcy case is converted to a case under Chapter 7, this shall constitute a default under the terms of this Stipulation. Debtors shall cure the pre-

petition and post-petition arrears within ten (10) days from the date of conversion. Should the Debtors fail to cure the arrears within ten (10) days from the date of conversion, counsel for Movant may file a Certification of Default with the Court and the Court shall enter an Order granting relief from the automatic stay as to the Property.

10. Debtors understands that should Movant be forced to provide a written Notice of Default of this Stipulation, that Debtors shall be responsible for any reasonable attorney fees of \$100.00 per Notice of Default and \$200.00 per Certification of Default incurred by Movant as a result of preparation of same.

11. The proof of claim of Specialized Loan Servicing, LLC is hereby updated to conform to this Agreed order, and further, this Agreed Order shall serve as a Supplemental Proof of Claim.

12. Debtors agrees that the Court may waive Rule 4001(a) (3), permitting Movant to immediately implement and enforce the Court's order.

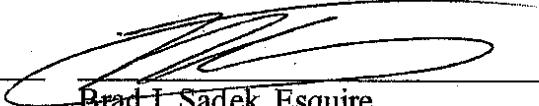
The parties request that this Honorable Court approve this stipulation.

Dated: 11/11/2021

/s/ Kristen D. Little

Christopher A. DeNardo 78447  
Kristen D. Little 79992  
Attorney for Movant

Dated: 11/15/21

  
Brad J. Sadek, Esquire  
Attorney for Debtors

No Objection  
/s/ LeeAne O. Huggins

Dated: November 9, 2021

William C. Miller  
Trustee

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2021, it is hereby  
ORDERED that the foregoing Stipulation is approved, shall be, and is made an Order of this  
Court.

BY THE COURT:

HONORABLE MAGDELINE D. COLEMAN  
UNITED STATES BANKRUPTCY JUDGE